

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MAZY SEHRGOSHA, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

KINDRED HEALTHCARE, INC.,  
PHYLLIS R. YALE, BENJAMIN A.  
BREIER, JOEL ACKERMAN, JONATHAN  
D. BLUM, PAUL J. DIAZ, HEYWARD R.  
DONIGAN, RICHARD GOODMAN,  
CHRISTOPHER T. HJELM FRED J.  
KLEISNER, SHARAD MANSUKANI,  
M.D., and LYNN SIMON, M.D.,

Defendants.

Case No. 1:18-cv-00230-RGA

**MOTION FOR PLAINTIFFS' APPLICATION FOR AN AWARD OF  
ATTORNEYS' FEES AND EXPENSES**

Plaintiff Mazy Sehrgosha ("Plaintiff") respectfully submits this Motion for an Application for Attorneys' Fees and Expenses (the "Motion") and moves this Court for an Order in the form attached hereto.<sup>1</sup> The grounds for this Motion are set forth in the accompanying Memorandum of Law and the Declaration of Blake A. Bennett, Esquire including the exhibits attached thereto.

---

<sup>1</sup> Plaintiff Debra Carter, a Kindred Healthcare stockholder, filed the action *Carter v. Kindred Healthcare, Inc.*, 18-cv-254, asserting similar allegations as Plaintiff Sehrgosha, participated in prosecuting the claims described herein, and joins in this application. The reference to "Plaintiffs" in this Brief refers solely to Plaintiffs Sehrgosha and Carter.

Dated: March 28, 2018

Respectfully submitted,

**COOCH AND TAYLOR, P.A.**

**OF COUNSEL:**

**MONTEVERDE & ASSOCIATES PC**

Juan E. Monteverde  
The Empire State Building  
350 Fifth Avenue, Suite 4405  
New York, NY 10118  
Telephone: (212) 971-1341  
Email: [jmonteverde@monteverdelaw.com](mailto:jmonteverde@monteverdelaw.com)

*Attorneys for Plaintiff*

/s/ Blake A. Bennett

Blake A. Bennett (#5133)  
The Brandywine Building  
1000 West Street, 10<sup>th</sup> Floor  
Wilmington, DE 19801  
Tel.: (302) 984-3800

*Attorney for Plaintiff*